

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JUAN R ESCOBAR DEBIEN

DEBTOR(S)

CASE NUMBER: 11-02120

CHAPTER 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to provide for co-debtor claim with BPPR.

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 27th day of April of 2011.

JPC LAW OFFICE

Jose M Prieto Carballo, Esq
P.O. Box 363565
San Juan, P.R. 00936-3565
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By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 11-02120-13

ESCOBAR DEBIEN, JUAN RAUL

Chapter 13

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>4-27-2011</u>																
<input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																
I. PAYMENT PLAN SCHEDULE <table style="width: 100%; border-collapse: collapse;"> <tr><td>\$ <u>310.00</u></td><td>x <u>60</u></td><td>= \$ <u>18,600.00</u></td></tr> <tr><td>\$ <u> </u></td><td>x <u> </u></td><td>= \$ <u> </u></td></tr> </table> TOTAL: \$ <u>18,600.00</u>		\$ <u>310.00</u>	x <u>60</u>	= \$ <u>18,600.00</u>	\$ <u> </u>	x <u> </u>	= \$ <u> </u>	\$ <u> </u>	x <u> </u>	= \$ <u> </u>	\$ <u> </u>	x <u> </u>	= \$ <u> </u>	\$ <u> </u>	x <u> </u>	= \$ <u> </u>	II. DISBURSEMENT SCHEDULE A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>Doral Financial Corp</u> Cr. <u>Oriental Bank</u> Cr. _____ # <u>8930070027348</u> # <u>61010010011455</u> # _____ \$ <u>4,300.00</u> \$ <u>9,150.00</u> \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: 5. <input type="checkbox"/> Other: 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>Doral Financial Corp</u> <u>Oriental Bank</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input checked="" type="checkbox"/> Classifies <input type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input checked="" type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input checked="" type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. <u>BPPR</u> Cr. _____ Cr. _____ # <u>1860</u> # _____ # _____ \$ <u>251.45</u> \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. OTHER PROVISIONS: (<i>Executory contracts; payment of interest to unsecureds, etc.</i>) FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5). ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330. TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.	
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\$ <u> </u>	x <u> </u>	= \$ <u> </u>																
Periodic Payments to be made other than, and in addition to the above: \$ <u> </u> x <u> </u> = \$ <u> </u>																		
PROPOSED BASE: \$ <u>18,600.00</u>																		
III. ATTORNEY'S FEES (Treated as § 507 Priorities)																		
Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,604.00</u>																		
Signed: <u>/s/ JUAN RAUL ESCOBAR DEBIEN</u> Debtor																		
Joint Debtor																		

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Label Matrix for local noticing

0104-3

Case 11-02120-ESL13

District of Puerto Rico

Old San Juan

Wed Apr 27 09:38:50 AST 2011

US Bankruptcy Court District of P.R.

U.S. Post Office and Courthouse Building

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

BANCO BILBAO VIZCAYA ARGENTARIA PR

PO BOX 364745

SAN JUAN, PR 00936-4745

DORAL BANK

PO BOX 70308

SAN JUAN, PR 00936-8308

Asset Acceptance Llc

Po Box 2036

Warren, MI 48090-2036

BANCO BILBAO VIZCAYA ARGENTARIA

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San Juan, PR 00936-4745

BANCO POPULAR DE PUERTO RICO

BANKRUPTCY DEPARTMENT

PO BOX 366818

SAN JUAN PR 00936-6818

Banco Popular De Puert

209 Munoz Rivera Ave

San Juan, PR 00918-1000

Citifinancial

Po Box 499

Hanover, MD 21076-0499

Claro

Po Box 360998

San Juan, PR 00936-0998

Credit Protection Asso

13355 Noel Rd Ste 2100

Dallas, TX 75240-6837

Doral Bank

P.O. Box 70308

San Juan, P.R. 00936-8308

Doral Financial Corp

PO BOX 71529

San Juan, PR 00936-8629

FIRST FINANCIAL PORTFOLIO MANAGEMENT INC

c o Jefferson Capital Systems LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

FORTUNO & FORTUNO FAS

PO BOX 9300

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Gemb/sams Club

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El Paso, TX 79998-1400

LCDO RAFAEL BRAS BENITEZ

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Oriental Bank

PO BOX 71578

San Juan, PR 00936-8678

Security Credit Servic

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Oxford, MS 38655-5442

Security Credit Services, LLC

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OCHOA BUILDING

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SAN JUAN, PR 00901-1938

End of Label Matrix

Mailable recipients 25

Bypassed recipients 0

Total 25